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10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

12 CureIS Healthcare, Inc.,

13 Plaintiff,

14 vs.

15 Epic Systems Corporation,

16 Defendant.

Case No. 3:25-cv-04108-MMC

**DECLARATION OF CHRISTOPHER
SAWOTIN IN SUPPORT OF PLAINTIFF
CUREIS'S OPPOSITION TO
DEFENDANT EPIC SYSTEMS
CORPORATION'S MOTION TO
TRANSFER VENUE**

Judge: Hon. Maxine M. Chesney

DECLARATION OF CHRISTOPHER SAWOTIN

I, Christopher Sawotin, declare as follows:

1. I am the Chief Executive Officer and co-founder of CureIS Healthcare, Inc. (“CureIS”), the plaintiff in the above-listed action. I have served CureIS in this capacity since I founded CureIS, in 2006.

2. I make this declaration in support of CureIS’s opposition to the motion to transfer venue to the Western District of Wisconsin filed by defendant Epic Systems Corporation (“Epic”). Except as otherwise indicated, I have personal knowledge of the facts stated herein and could testify competently thereto if called to do so in this matter.

3. CureIS does not have, nor has it ever had, any offices or places of business in Wisconsin. While CureIS was originally founded in Woodbury, Minnesota, CureIS no longer has any physical office in Minnesota. CureIS’s only remaining physical office location in the United States is located at 1640 East River Road, Suite 208 Tucson, Arizona 85718.

4. CureIS currently employs 49 full-time employees. There are currently 10 CureIS employees that work in the Tucson, Arizona office. The remaining 39 CureIS employees work fully remote and live in different locations across the country.

5. CureIS’s mission is to deliver best-in-class software solutions to healthcare organizations that administer government managed care programs. Government managed care programs, such as Medicare and Medicaid, demand that health plans administering those programs comply with complex and highly technical reporting requirements. Because California was one of the first states to enter into risk contracts with managed care plans, it has historically had a more robust market for managed care. That is why CureIS works with more customers in California than any other state.

6. Nearly 60% of CureIS’s total revenue is derived from customers based in California. Since 2015, the proportion of CureIS customers based in California has ranged between 42% and 31%. The remaining customers are based in a variety of different states. Throughout this period, CureIS has not worked with a single customer that is based in Wisconsin.

7. CureIS prides itself on its white glove approach to customer service. As a result, CureIS employees are in very frequent contact with the Information Technology (“IT”) staff and the executive leadership at current and prospective customers. This level of service helps CureIS differentiate itself from larger software companies, such as Epic, that are less able to nimbly respond to customers’ needs and requests.

8. The CureIS employees that provide this white glove service build close, sometimes lifelong relationships with their counterparts at each CureIS customer. These CureIS employees were the first ones to hear about Epic’s interference from CureIS’s customers. The CureIS employees with the most knowledge regarding Epic’s interference include: [REDACTED], who resides in Tucson, Arizona; [REDACTED], who resides in Norco, California; and [REDACTED], who resides in Johnson City, Tennessee.

9. Members of CureIS’s leadership team, including myself, also have knowledge of the events at issue in the Complaint. These individuals include: Linda Goodrich, who lives in Pasadena, California; Emmet Pope, who resides in Tucson, Arizona; Art Segovia, who resides in McKinney, Texas; and Bret Randolph, who resides in Hudson, Wisconsin.

10. The Complaint identifies seven companies that Epic forced to stop using CureIS’s products. Of these seven companies, five are headquartered in California. Those include [REDACTED] which is headquartered in [REDACTED] California; [REDACTED] and [REDACTED] (collectively, [REDACTED], which are headquartered in [REDACTED], California; [REDACTED] which is headquartered in [REDACTED] California; and [REDACTED] which is headquartered in [REDACTED], California. CureIS has identified several individuals at each company that have knowledge of the events underlying the Complaint. On information and belief, all of these individuals, with one exception, reside in California.

11. [REDACTED], one of the customers identified in the Complaint, is headquartered in [REDACTED] California. The following individuals at [REDACTED] are knowledgeable about Epic’s interference with [REDACTED] relationship with CureIS: [REDACTED], an Eligibility Manager and [REDACTED], an Eligibility Supervisor. [REDACTED] and [REDACTED] work in or near [REDACTED] California.

12. [REDACTED] and [REDACTED], two of the customers identified in the Complaint, are headquartered in [REDACTED], California. The following individuals at [REDACTED] are knowledgeable about Epic's interference with [REDACTED] relationship with CureIS: [REDACTED], a Senior Systems Analyst; [REDACTED], Vice President of Post Acute Revenue Cycle and Managed Care Operations; and [REDACTED], Vice President of Revenue Cycle Management & Enterprise Resource Planning Systems. [REDACTED] and [REDACTED] work in [REDACTED], California, and [REDACTED] works in Colorado. [REDACTED], [REDACTED]'s Chief Health Care Information Officer, works in [REDACTED] California.

13. [REDACTED], one of the customers identified in the Complaint, is headquartered in [REDACTED], California. [REDACTED] served as the Chief Financial Officer at [REDACTED] throughout the period identified in the Complaint, and is knowledgeable about Epic's interference with [REDACTED]'s relationship with CureIS. [REDACTED] works in [REDACTED], California. [REDACTED] is the Chief Information Officer at [REDACTED], and is knowledgeable about Epic's interference with [REDACTED]'s relationship with CureIS. [REDACTED] works in [REDACTED], California. In addition, [REDACTED] employees [REDACTED], [REDACTED] and [REDACTED] were also closely involved with CureIS's thwarted attempts to integrate with Epic's EHR, Epic's blocking of CureIS's access to data, and Epic's misrepresentations and related misappropriation of CureIS's trade secrets. These three employees also work in California.


14. [REDACTED] one of the customers identified in the Complaint, is headquartered in [REDACTED], California. [REDACTED], a [REDACTED] employee who witnessed Epic exert significant pressure on [REDACTED] to terminate its relationship with CureIS, works in [REDACTED] California. [REDACTED], Senior Vice President and Chief Information Officer at [REDACTED], is also knowledgeable about Epic's interference with [REDACTED]'s relationship with CureIS and works in California. [REDACTED], Information Systems Executive Director at [REDACTED], is also knowledgeable about Epic's interference with [REDACTED]'s relationship with CureIS and works in California.

15. [REDACTED], a [REDACTED] employee who has first-hand knowledge of Epic's misrepresentations regarding CureIS's products, works in California.

1 16. Given that at least 14 non-party witnesses identified to date live in California, and
2 most CureIS employees with relevant knowledge live closer to California than Wisconsin, it would
3 be more convenient for those witnesses and for CureIS to keep the case in this Court. It would also
4 be much more convenient for myself and less costly for CureIS to keep the case in this Court.

5
6 I declare under penalty of perjury under the laws of the State of California and the United
7 States of America that the foregoing is true and correct, and that this declaration was executed in
8 Grantsburg, Wisconsin, on July 1, 2025.

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11
12 DATED: July 1, 2025

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14 
Chris Sawotin (Jul 1, 2025 16:35 CDT)

15 Christopher Sawotin, CEO of CureIS Healthcare,
16 Inc.